

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**ASHU JOSHI**

**Defendant.**

**4:18-cr-00876-JAR-NCC**

**MOTION TO ORDER/ALLOW DEFENDANT TO PAY CHILD SUPPORT  
AS A CONDITION/MODIFICATION OF DEFENDANT'S BOND**

Comes now M.D., by and through counsel, and hereby moves this Court to order/allow the Defendant to pay child support to M.D., either as a condition of his bond or by finding that this is not violative of the conditions of the Defendant's current bond. In support thereof, M.D. states as follows:

1. Defendant is the biological and legal father of A.J. (Defendant's and M.D.'s child).
2. A.J. was born on 04-xx-2019 and is 9 months old.
3. Paternity was subsequently established in the State of Kentucky.
4. On November 8, 2019, the State of Kentucky issued an Order legally recognizing the June 23, 2018 marriage of Defendant and M.D. and further found that M.D. and Defendant were deemed legally married as of June 23, 2018. (See Exhibit 1)

5. Both the marriage and the paternity establish a legal obligation for the Defendant to support his child in accordance with the Order and laws from the State of Kentucky.

WHEREFORE, M.D. requests that Defendant be ordered/allowed to fulfill his legal obligation to support his child. Additionally, M.D. requests that all past support obligations from A.J.'s birth to present be ordered/allowed to be paid to her in a lump sum payment.

Respectfully submitted,

MUHLENKAMP & BERNSEN,  
ATTORNEYS AT LAW, LLC

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ATTORNEY FOR ALLEGED VICTIM

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the above document was electronically filed on January 7, 2020 and served via the electronic filing system to all attorneys of record.

Tory D. Bernsen